

# Exhibit “D”

**From:** "Rolwing, Richard M. (TAX)" <[REDACTED]>  
**Date:** August 24, 2023 at 6:28:10 PM PDT  
**To:** Mark Geragos <[REDACTED]>, Setara Qassim <[REDACTED]>  
**Cc:** "Suhr, Erika V. (TAX)" <[REDACTED]>, "Sullivan, John E. (TAX)" <[REDACTED]>, Washburn Stephen A <[REDACTED]>  
**Subject:** RE: [EXTERNAL] Re: Recent discovery

Mark/Setara:

Sorry guys I'm in week 7 of another monster trial and haven't been able to devote time elsewhere. In the defense case now.

As for the documents, they were not produced in response to a government request, but rather voluntarily turned over by Sally Kingston's lawyer.

There is no related MOI of either Sally or Jacob Kingston and they have not been interviewed about these documents to date. Again, I've been in trial all summer.

As for your last question, if you can wait until the conclusion of my trial in September, we'd like to discuss that issue with you.

Hope you are well.

Rich and team

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**From:** Mark Geragos <[REDACTED]>  
**Sent:** Thursday, August 24, 2023 8:40 PM  
**To:** Setara Qassim <[REDACTED]>  
**Cc:** Rolwing, Richard M. (TAX) <[REDACTED]>; Suhr, Erika V. (TAX) <[REDACTED]>; Sullivan, John E. (TAX) <[REDACTED]>; Washburn Stephen A <[REDACTED]>  
**Subject:** [EXTERNAL] Re: Recent discovery

Good Evening Rich, following up here.

On Tue, Aug 22, 2023 at 8:36 AM Setara Qassim <[REDACTED]> wrote:

Rich,

Were these documents turned over in response to a government request? Is there a related MOI of either Sally or Jacob after the government received the documents? Are there any additional items in the government's possession that we should expect before addressing these with the Court?

Sent from my iPhone

On Jun 21, 2023, at 2:22 PM, Rolwing, Richard M. (TAX) <[REDACTED]> wrote:

Mark & Setara,

We recently received some documents from counsel for Sally Kingston in connection with her stated desire to begin cooperating with the government in *United States v. Sezgin Baran Korkmaz*, No. 2:21-cr-140-JNP (D. Utah). By this email, we are electronically providing you copies of the documents via our cloud-based file sharing system. They consist of 47 files that were provided to the government on May 25, 2023 by Sally Kingston's counsel. We were informed that the documents were in the possession of Sally Kingston and had not previously been disclosed to the government. The link that will allow you to download the documents is: <https://jefs.box.com/s/0brc9dx6qcpq824jgltrgrkhqeyyfinq>

This discovery is being provided to you pursuant to the October 3, 2018 protective order, see ECF 67 & 69.

Please do not hesitate to contact us with any questions or issues regarding access.

Rich and team

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